

Marc S. Dreier (MD-9713)
Joel A. Chernov (JC-8789)
Regina M. Alter (RA-7014)
DREIER LLP
499 Park Avenue
New York, New York 10022
(212) 328-6100

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
ROBERTO BAUTISTA FRANCO BACCANELLI, :

Plaintiff, :

-against- :

THE REPUBLIC OF ARGENTINA, :

Defendant. :
----- X

07 CV 3851 (TPG)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the annexed declarations of Roberto Bautista Franco Baccanelli, dated October 30, 2007, and Regina Alter, dated November 15, 2007, with annexed exhibits; the Statement of Material Facts Pursuant to Local Rule 56.1; the accompanying Memorandum of Law; and the pleadings and all prior proceedings had herein, the undersigned will move this Court before the Honorable Thomas P. Griesa, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at such time as the Court directs, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting plaintiff summary judgment as against defendant the Republic of Argentina, to strike defendant's discovery requests, and for such other relief as the Court deems just and proper.

Dated: New York, New York
November 15, 2007

DREIER LLP

By: 

Marc S. Dreier (MD-9713)

Joel A. Chernov (JC-8789)

Regina M. Alter (RA-7014)

499 Park Avenue
New York, New York 10022
(212) 328-6100

Attorneys for Plaintiff